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CONESTOGA-ROVERS & ASSOCIATES

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June 20, 1996

Reference No. 3481

Ms. Sheri Bianchin
UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY (USEPA)
Region V (HSRL-6J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- ORIGINAL -
THIS DOCUMENT PREVIOUSLY
TRANSMITTED BY TELECOPIER

Dear Ms. Bianchin:

Re: Approval of PGCS and Barrier Wall
American Chemical Service



Through our recent meetings and discussions, we now clearly understand that USEPA has provided approval for the ACS PRP Group to proceed with the construction of the Perimeter Groundwater Containment System (PGCS) remedy and the barrier wall. However, our review of correspondence shows that letters received to date do not provide clear written confirmation of these approvals. We need to receive such unequivocal written approvals.

With respect to the PGCS, Montgomery Watson's letter of April 4, 1996 requested approval to proceed with procuring the treatment plant equipment and the construction of the building. Your letter of April 10, 1996 provides approval of Montgomery Watson's request. It was our understanding, at the time, that we would proceed with the construction of the building and that we would order the key treatment equipment in order to keep the project moving while USEPA reviewed and approved the design. We understand now that your intent was to provide approval for construction of the entire PGCS. Hence, we request that you provide a letter which states that USEPA will not be providing comments on the 50% or 100% Design, other than the Performance Standard Verification Plan, and that we have your approval to construct and operate the PGCS.

With respect to the barrier wall, your letter of June 6, 1996 states that you approve the design/build approach and the proposed alignment for the dewatering/barrier wall system. However, in order to obtain written confirmation, we request that you prepare a letter which states that USEPA will not be providing approval of the design except for the Performance Standard Verification Plan and that we have your approval to construct the entire barrier wall/dewatering system.

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We also look forward to your comments on the pilot studies in order that we may proceed with the pilot study program this summer.

We know that you feel that you have already provided approval for the PGCS and the barrier wall. However, our review of the written correspondence leaves us with a degree of uncertainty. Given the importance and scope of the contemplated actions, we believe the clear approval letters requested should not be an issue.

If you have any questions, please contact us.

Sincerely,

CONESTOGA-ROVERS & ASSOCIATES

Benita Robinson

for Ronald Frehner

RF/br

c.c. Holly Grejda; IDEM
Rob Lance; Black & Veatch
Jim Mayka; USEPA-Region V (SR-6J)
Wendy Carney; USEPA-Region V (SR-6J)
Linda Nachowicz; USEPA-Region V (SR-6J)
ACS Technical Committee